

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	Case No. 22-20367-CMB
Patricia J. Dugan	:	
	:	
Debtor(s)	:	Chapter 13
	:	
PNC Bank, National Association, its	:	
successors and/or assigns	:	
Movant(s)	:	Related to Document 42
	:	
vs.	:	Hearing Date: 12/13/22 at 10:00 a.m.
	:	
Patrician J. Dugan	:	
William E. Dugan (Co-Mortgagor)	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AS TO PROPERTY LOCATED
AT 309 DELAWARE AVENUE, NORTH VERSAILLES, PA 15137

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. PNC BANK, NATIONAL ASSOCIATION, its successors and/or assigns, requests relief from the co-debtor stay with regard to property located at 309 Delaware Avenue, North Versailles, PA, 15137.

2. Debtor's Schedules reflect that the fair market value of the property is \$150,000, and Debtor has claimed an exemption of \$25,150.00 under 11 U.S.C. § 522(d)(1).

3. Per Debtor's schedule D, Movant is the holder of a mortgage against the property with a claim in the amount of \$41,000.00.

4. Additional lienholders include Allegheny County Treasurer, East Allegheny School District, North Versailles Township, and North Versailles Township Sanitary Authority with secured claims against the property totaling \$33,706.94.

5. The amount in liens against the property is \$74,706.94, leaving

\$50,143.06 in total equity.

6. Although it is admitted that Debtor's plan payments are \$7,115.00 in arrears, Movant's interests are preserved by a substantial equity cushion which should be preserved for the benefit of the estate.

WHEREFORE, the Trustee respectfully requests that this motion be denied, or in the alternative, that the case be converted to Chapter 7.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: November 22, 2022

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
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Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd of November 2022, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Patricia and William Dugan
309 Delaware Avenue
North Versailles, PA 15137

Kenneth Steidl, Esquire
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/s/Rosa M. Richard
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